

Exhibit 2



January 6, 2026

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Co-Lead Counsel for MDL Plaintiffs

***Co-Lead Counsel for JCCP
Plaintiffs***

Re: *In Re: Uber Rideshare Cases*, JCCP No. 5188; and *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation, MDL 3084*

Dear Counsel:

On behalf of our clients, Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”), we are clawing back and re-producing via secure file transfer portal documents inadvertently produced. This privilege clawback is made pursuant to the Stipulation and Protective Order issued in the JCCP on March 6, 2025, the MDL Protective Order (ECF 176), PTO 14 (ECF 396), and in accordance with PTO 16 (ECF 866). The Bates number, privilege log number, and production volume of the privileged documents are listed below.

January 6, 2026
Page 2

Beginning Bates – Ending Bates	JCCP_MDL Priv Log No.	Prod. Volume
UBER_JCCP_MDL_000908314 - UBER_JCCP_MDL_000908314	Forthcoming	JCCP_MDL017; JCCP_MDL125
UBER_JCCP_MDL_003679334 - UBER_JCCP_MDL_003679334	Forthcoming	JCCP_MDL135
UBER_JCCP_MDL_005453872 - UBER_JCCP_MDL_005453878	JCCP_MDL_PRIVLOG093175	JCCP_MDL151
UBER_JCCP_MDL_002340646 - UBER_JCCP_MDL_002340658	Forthcoming	JCCP_MDL064
UBER_JCCP_MDL_005086849 - UBER_JCCP_MDL_005086849	Forthcoming	JCCP_MDL190
UBER_JCCP_MDL_001197028 - UBER_JCCP_MDL_001197029	Forthcoming	JCCP_MDL033
UBER_JCCP_MDL_005353908 - UBER_JCCP_MDL_005354204	Forthcoming	JCCP_MDL197
UBER_JCCP_MDL_003610881 - UBER_JCCP_MDL_003610932	JCCP_MDL_PRIVLOG076958	JCCP_MDL132

Defendants did not waive their privilege claim by the inadvertent production of this privileged material, and make this privilege clawback pursuant to the Stipulation and Protective Order issued in the JCCP on March 6, 2025, Federal Rule of Civil Procedure 26 (b)(5)(B), the MDL Protective Order (ECF 176), and Stipulated Pretrial Order No. 14: Federal Rule of Evidence 502 (D) and Privilege Materials (ECF 396).

In accordance with Section 11 of the JCCP Stipulation and Amended Protective Order entered on March 6, 2025, Defendants demand that JCCP Plaintiffs and their counsel take the following immediate steps as required by the Order: (1) use reasonable efforts to destroy or sequester all copies of the inadvertently produced document and associated metadata in their possession, custody, or control and notify Defendants when they have done so; and (2) take reasonable steps to retrieve and destroy or sequester the inadvertently produced privileged material and associated metadata from other persons, if any, to whom such privileged document and associated metadata has been provided, and notify Defendants when they have done so.

Likewise, pursuant to Section 11 of MDL Protective Order (ECF 176), Federal Rule of Civil Procedure 26 (b)(5)(B), and Stipulated Pretrial Order No. 14: Federal Rule of Evidence 502 (D) and Privilege Materials (ECF 396), Defendants demand that

MDL Plaintiffs and their counsel take the following immediate steps: (1) sequester, destroy, or return the inadvertently produced document and associated metadata, and all copies thereof, as well as any analyses, memoranda, or notes or portions thereof which were internally generated and contain or were based upon the privileged materials identified in this letter; (2) not use or disclose the information for any purpose except contesting the assertion of privilege; (3) take reasonable steps to retrieve the information if you disclosed it before being notified; and (4) notify Defendants when they have taken these steps.

January 6, 2026
Page 3

We will be re-producing the documents at issue with privilege slipsheets and/or redactions via secure file transfer portal. Per the agreement of the parties in the JCCP and MDL, Defendants are making a single production in both actions, with the Bates prefix of UBER_JCCP_MDL.

Defendants reserve their right to seek further relief concerning this matter as provided in the relevant court orders, rules, or statutes. Defendants also reserve the right to amend, supplement, correct, or modify the information contained herein and in the associated documents, if and as we obtain additional information.

Sincerely,



Michael B. Shortnacy
Partner

Counsel for Defendants
Uber Technologies, Inc., Rasier LLC, and Rasier-CA LLC